and appropriate weight management, is key to a healthy lifestyle and is essential to cardiovascular – and overall – health.

AHA offers the following comments for consideration by the Dietary Guidelines Advisory Committee as it prepares its recommendations. AHA's comments are largely based on the Association's scientific statement Diet and Lifestyle Recommendations: Revisions 2006 (See Attachment A).

# **Carbohydrates**

## Added Sugars

The Dietary Guidelines should set a limit on intake of added sugars. Added sugars are a significant source of empty calories and may be associated with greater overall calorie intake, higher body weights, and lower intakes of essential nutrients. Excess sugar consumption has also been linked to several metabolic abnormalities and adverse health conditions.

No more than one-half of discretionary calories should come from added sugars. The limit for most women would be no more than 100 calories per day and no more than 150 calories for men.

#### Fiber

The Dietary Guidelines should emphasize food-based sources of fiber. Consumption of high fiber foods such as legumes, whole-grain products, and fruits and vegetables will help individuals meet the Guidelines in their entirety. Dietary fiber may also promote satiety, leading to an overall decrease in calorie intake.

#### Whole Grains

The Committee should make a point to recommend a decrease in consumption of refined grains such as white bread and white rice and continue with previous advice to keep at least half of all grains whole. The Guidelines should encourage individuals to replace refined carbohydrates with whole grains with specific examples of foods to consume.

The Dietary Guidelines Advisory Committee should also recommend in its report to the federal agencies that they develop a single definition for whole grains that is easily understood by consumers and can be adopted for use by the food industry.

#### Protein

The current Dietary Guidelines address the consumption of meat, poultry, and fish as a combined food group. AHA strongly urges the Advisory Committee to place an increased emphasis on the consumption of fish; fish should be featured as a major source of protein. AHA recommends the consumption of fish, especially oily fish, at least twice a week. Oily fish is rich in long-chain omega-3 polyunsaturated fatty acids and the consumption of two servings per week has been associated with a reduced risk of both sudden death and death from coronary artery disease.

nutrients. Therefore, to ensure nutrient adequacy and replace sweat losses, healthy adults generally need about 1,500 mg a day.<sup>2</sup>

To accommodate a more realistic approach for reducing the sodium intake to 1,500mg in the 2010 Dietary Guidelines, the Committee may want to consider making a recommendation for reducing sodium in two phases. In recent comments to the Food and Drug Administration and the Institute of Medicine, AHA recommended that the daily value for sodium be lowered to 1,500mg by 2020 with an intermediate goal of 2,000mg by 2013. This two-step phase down should provide manufacturers with time to reformulate products and identify acceptable salt substitutes, as well as allow consumers to adapt their taste sensitivities to the lower sodium content in foods.

To meet a science-based recommendation of 1,500mg per day, the scientific report and the policy document must strongly encourage consumers to reduce sodium intake by choosing foods with little or no salt and limiting the amount of salt added to food. However, we acknowledge that it will be difficult for consumers to lower their sodium intake to 1,500mg on their own. With processed foods accounting for 77% of all sodium consumed, it will require the cooperation of food manufacturers and restaurants to reduce the sodium content of the foods they make available to the public. AHA would like to see food manufacturers and restaurants reduce the salt added to foods by 50% over the next 10 years.

# **Beverages**

The current Guidelines recommend that consumers select beverages with little added sugars or caloric sweeteners. AHA agrees with this recommendation; the 2006 AHA Diet and Lifestyle Recommendations suggest limiting beverages that are high in added sugars.

In recent years the consumption of beverages with added sugars has risen markedly. High calorie energy drinks and caffeinated beverages have become the leading source of added sugar in the diet. This is concerning because high consumption of beverages with added sugars has been associated with consumption of greater calories and weight gain. Consumers tend not to compensate as well for calories consumed in liquid form when compared to calories consumed as solid foods. Because calories consumed as beverages may not be as satiating, we tend to overconsume beverages and other foods.

The Committee should address and emphasize high calorie energy drinks and caffeinated beverages in the updated Guidelines.

### **Vitamins**

The Dietary Guidelines recommend consumption of a number of vitamins including vitamins A, C, D, E, and  $B_{12}$ . Individuals are instructed to obtain these vitamins through vitamin-rich sources of food, fortified foods, and/or supplements.

<sup>&</sup>lt;sup>2</sup> Institute of Medicine. *Dietary Reference Intakes: Water, Potassium, Sodium Chloride, and Sulfate.* 1<sup>st</sup> ed. Washington, DC: National Academy Press; 2004.